

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**UNI-SCREW EUROPE BV,**

**Plaintiff,**

**v.**

**UNISCREW WORLDWIDE, INC. and  
STEWART TIPPING,**

**Defendants.**

No. 07 CV 7033 (PKC)(AJP)

**PLAINTIFF'S MOTION TO FILE EXHIBITS UNDER SEAL**

Plaintiff Uni-Screw Europe BV ("BV") hereby moves this Court pursuant to Fed. R. Civ. P. 26(c) for an order to file under seal certain documents relating to Plaintiff's Motion for Entry of Default Judgment, which was filed in the captioned case on January 17, 2008.

Exhibits A and B to the Declaration of Bruce J. Rose in Support of Plaintiff's Motion for Entry of Default Judgment (copies of which are attached only to the courtesy copy of this motion) are documents which detail the legal fees paid by the Plaintiff in connection with this Action, and contain confidential and privileged information regarding the services provided by counsel for the Plaintiff in connection with the prosecution of this case. The Declaration of Frank Romeijn in Support of Plaintiff's Motion for Entry of Default Judgment contains highly confidential information regarding the operating expenses of the Plaintiff. As such Plaintiff respectfully requests that the Court file these documents under seal.

There is still no protective order in place, as Defendant Uniscrew Worldwide Inc. has failed to appear in this Action, and we have been unable to effect service of the Complaint on Defendant Tipping.

Dated: January 17, 2007

Respectfully submitted,

/s/ Sarah C. Hsia

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**[PROPOSED] ORDER SEALING CERTAIN DOCUMENTS**

Upon the request of Plaintiff Uni-Screw Europe BV to file under seal Exhibit A of its January 17, 2008 Motion for Entry of Default Judgment,

IT IS HEREBY ORDERED that Plaintiff's Motion to File Exhibit Under Seal is GRANTED and that Exhibit A to Plaintiff's Motion for Entry of Default Judgment filed January 17, 2008 shall be maintained under seal by the Clerk of the Court.

Dated: New York, New York  
January \_\_, 2008

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HON. P. KEVIN CASTEL, U.S.D.J.